

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

RE: PEDRO MAGDALENO	)	Case No. 24 B 10575
	)	
	)	Chapter 13
Debtor(s)	)	
	)	Judge: DONALD R CASSLING

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** Thomas H. Hooper, Chapter 13 Trustee duly appointed to administer the instant case ("Trustee"), and hereby OBJECTS to confirmation of the Chapter 13 plan filed by Debtor(s), in advance of the confirmation hearing set for September 12, 2024 10:00 am, for the following:

Debtor has failed to provide copies to the Trustee of the most recently filed tax returns in accordance with 11 U.S.C. §§ 521(e)(2)(A)(i), and 1325(a)(1). Missing 2020, 2021 and 2023 tax returns and provide proof that returns were filed.

Debtor has failed to provide copies of 60 days of pay advices and/or other evidence of income in accordance with 11 U.S.C. §§ 521(a)(1)(B), 1325(a)(1). Debtor to provide proof of business income.

**WHEREFORE**, the Trustee prays the Court to enter an Order denying confirmation of the proposed Chapter 13 plan, and for such other and further relief as the Court may deem just and proper. In the alternative, the Trustee requests a hearing on the matter.

Dated: August 28, 2024

/s/ Thomas H. Hooper  
Thomas H. Hooper  
Chapter 13 Trustee  
55 E. Monroe St., Suite 3850  
Chicago, IL 60603  
(312) 294-5900

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**CERTIFICATE OF SERVICE**

I, Emily Baez, a non-attorney, do hereby certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on the date indicated herein below, I served copies of the foregoing TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN by depositing a copy of the same in a postage-paid envelope with the United States Postal Service or by electronic means, as indicated.

VW LAW LLC  
*Attorney for Debtor*

(via CM/ECF)

Patrick Layng  
United States Trustee

(via CM/ECF)

PEDRO MAGDALENO  
6300 W GEORGE #1F  
CHICAGO, IL 60634  
*debtor*

(via First Class Mail)

Dated: August 28, 2024

/s/ Emily Baez

Thomas H. Hooper  
Chapter 13 Trustee  
55 E. Monroe St., Suite 3850  
Chicago, IL 60603  
(312) 294-5900